UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: ECL-116

Date: May 13, 2000

From: Mike Sibley, OSC Dept.: USEPA-10 (ECL-116)

Tel No: (206) 553-1886

To: See distribution on last page

SUBJECT: POLREP 5 for TAYLOR LUMBER AND TREATING, INC.
Removal Action, Sheridan, Oregon

II BACKGROUND

Site No.:	10F1
Action Memo Status:	September 28, 1999
Delivery Order:	PRP Lead
NPL Status:	Not listed
Response Authority:	CERCLA
State Notification:	Oregon Department of Environmental Quality notified
Response Start Date:	November 29, 1999
Completion Date:	October 31, 2000
Incident Category:	Removal Action
Website Address:	

http://epainotes1.rtpnc.epa.gov:7777/R10/CLEANUP.NSF/sites/TLT

The Taylor Lumber and Treating, Inc. (TLT) site, located in Sheridan, Oregon, is a wood-treating facility that manufactures lumber, wooden telephone and electrical power poles, pilings, and railroad ties. The preserved products (poles, pilings, and railroad ties) are coated with either creosote or pentachlorophenol (PCP) solutions. P-9 oil (petroleum products) is also used in conjunction with PCP. In previous years, the facility used a chrome, copper, and arsenic (CCA) solution for preservation. Operating practices and spills have resulted in contamination of surface soil, subsurface soil, and groundwater. Contamination has migrated off site via ditches on the perimeter of the property and via air releases.

Several investigations have revealed widespread surface soil contamination (especially arsenic), contamination of sediment in ditches and groundwater contamination.
An EPA Listing Site Inspection was conducted in 1990, RCRA Facility Inspections were

conducted in 1991 and 1996, and an EPA Integrated Assessment is in progress. Several residences are located within ¼ mile of the facility and ditches lead to the South Yamhill River several hundred feet south of the facility.

The South Yamhill River is habitat to for anadromous fish, including Coho Salmon and Steelhead Trout. Other recreational species include Largemouth Bass, Bluegill, Crappie, and Channel Fish. Groundwater contamination, roughly 20 feet below ground surface, consists of a product layer one to several feet thick resting on siltstone. The product layer is migrating toward the Highway to the south of the facility and the South Yamhill River.

III SITE INFORMATION

A. Incident Category: The CERCLIS ID number for this site is ORD009042532.

B. Site Description

(See POLREP 1).

C. Situations

1. Removal Actions from April 17-22

April 17-22

Personnel on site: 1 ERT, 2 REAC contractors
Weather: Partly cloudy, rain showers, temperature in the 40's to (Mid 40s).

ERT was asked to assess shallow (i.e.,less than 50 feet below surface), subsurface stratigraphy, structure, and hydrogeological conditions. This data will assist in evaluating potential contaminant-migration pathways (e.g., paleochannels, bedrock-overburden contact-surface). Beginning on 17 April 2000, GEO staff have used the following methods to accomplish these goals:

- Measure media levels in existing monitor wells on and adjacent the site;

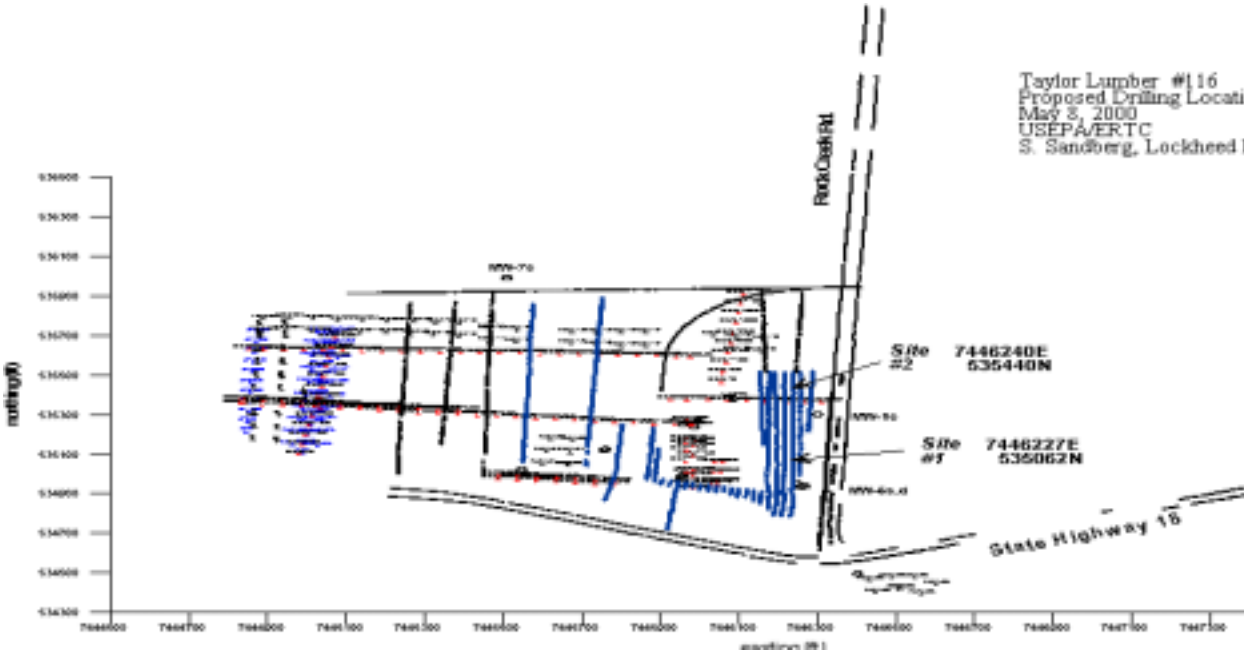
- Conduct a frequency-domain electromagnetic survey of the site with a Geonics EM-31 terrain conductivity tool;

- Conduct a time-domain electromagnetic survey of the site using the TEM method;

- Map site features and geophysical data stations with a DGPS system.

Both types of electromagnetic methods respond to vertical and lateral variations in conductivity/resistivity. These two methods also permit investigation of different exploration depths, because of different coil separations and operating frequencies. The EM-31 tool is being used primarily to identify paleochannels, while the TEM method is being used to resolve depth to bedrock.

Preliminary analyses of data, collected during 4/19 - 4/23, suggest that paleochannels exist on-site and the bedrock-overburden contact surface is irregular laterally. These data have been collected primarily from the eastern and northeastern sections of the site. To resolve subsurface features thoroughly, additional data are required (i.e., fill in data gaps in the eastern and northeastern sections, additional lines in the southern and western sections of the site).



The recommended drill locations will be used to delineate the topography of the siltstone and the lateral extent of the non-aqueous phase liquid.

The drilling investigation will be conducted in an area approximately 600 feet x 700 feet. Approximately 21 test boreholes will be drilled at the facility outside the previously identified NAPL plume. Approximately 4-5 soil samples will be collected from each borehole and field screened by a mobile laboratory to identify presence of PAHs and PCP. The concentrations of PAHs and PCP in soil samples will be compared to action levels. If the concentrations of PAHs or PCP are higher than the action levels, additional boreholes will be drilled until the concentrations are below the action levels. After field screening, approximately 25% of the samples will be submitted to an off-site

laboratory for analysis. Up to 4 of the 21 boreholes will be completed as monitoring wells. At each monitoring well, one groundwater water sample will be collected and submitted to the off-site laboratory for analysis

2. Removal Actions to Date

May 8, 2000 (Monday)

Personnel on site: 1 OSC, 2 EPA Mobile Lab, 4 START, 6 ERRS
Weather: Rain showers, ice, temperature in the 40's.

EPA, START, EQM & subcontractor Cascade Drilling mobed to site. All site personnel attended daily safety meeting and discussed site safety and planned activities. Cascade Drilling, drilled one test borehole at the south end of drip pad and took samples.

May 9, 2000 (Tuesday)

Personnel on site: 1 OSC, 2 EPA Mobile Lab, 4 START, 6 ERRS
Weather: Cloudy, rain showers, high winds, temperature in the 50's.

Cascade Drilling & START continuing borehole & sampling. Having difficult time getting enough soil for a sample due to high gravel content

May 10, 2000 (Wednesday)

Personnel on site: 1 OSC, 2 EPA Mobile Lab, 4 START, 6 ERRS
Weather: Cloudy, rain showers, light winds, temperature in the 50's.

Cascade Drilling & START continuing borehole & sampling. Drilled two monitoring wells. Currently arranging for subcontractor to do a detailed site survey.

Soil samples given to EPA mobile lab for analysis.

May 11, 2000 (Thursday)

Personnel on site: 1 OSC, 2 EPA Mobile Lab, 4 START, 6 ERRS
Weather: Cloudy, rain showers, light winds, temperature in the 40's.

Cascade Drilling & START continuing borehole & sampling. Drilled two additional monitoring wells for a total of four.

May 12, 2000 (Friday)

Personnel on site: 1 OSC, 2 EPA Mobile Lab, 4 START, 6 ERRS

Weather: Cloudy, rain showers, light winds, temperature in the 40's.
Cascade Drilling & START continuing borehole & sampling work. Sent samples off to Sound Analytical & EPA mobile lab for analysis.

May 13, 2000 (Saturday)

Personnel on site: 1 OSC, 2 EPA Mobile Lab, 4 START, 6 ERRS
Weather: Cloudy, rain showers, light winds, temperature in the 40's.

Cascade Drilling & START continuing borehole & sampling. Removed approximately 60 gallons of NAPL from monitoring well (TB 116).

Completed 22 boreholes & installed 4 monitoring wells.

D. Planned Removal Activities

To minimize/eliminate the threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

1. Install slurry wall & asphalt cap during August/September 2000.
2. Dispose of contaminated soils during October 2000.

E. Next Steps

1. Analyze the additional site work data from ERT & START (May 2000).
2. Perform site survey (May 2000)
3. Receive validated analytical data (May 2000)
4. Receive revised survey maps (May 2000)
5. Receive aquifer characterization report, (May 2000)
5. Develop technical specifications & detailed design drawings for slurry wall & asphalt cap.
6. Receive risk assessment report (May 2000)
7. Excavate submerged portions of ditches when water dries up. Also complete concrete slab in front of retorts (Taylor) (July 2000)

IV COST INFORMATION

Estimated costs are summarized below:

	Established Ceiling	Estimated Costs (As of 05/13/00)
START	$170,000	$323,604.00
EPA	$10,000	$7,000.00
USCG	$50,000	$10,551.25
ERRS	$886,200	$342,002.85

TOTAL $1,116,200 $683,158.10

V DISPOSITION OF WASTES

The following wastes are staged on site as of January 21, 2000. This is the existing waste which was staged from a spill cleanup which concluded in late November 1999.

Soil Staged in Treating Yard 1,700 cubic yards

As of this date, 65 cubic yards of rock has been washed & screened out of the 1,700 cubic yards which is staged in the treating yard.

VI DISTRIBUTION

TO: EPA Headquarters, Washington, D.C., Attention: Terry Eby
EPA Region 10, Attention: Chris Field
EPA Region 10, Attention: OSC's
STATE OF OREGON (ODEQ)
Robert Danko/Kerri Nelson/Keith Andersen